

Daniel S. Szalkiewicz, Esq.
DANIEL SZALKIEWICZ & ASSOCIATES, P.C.
23 WEST 73RD STREET
SUITE 102
NEW YORK, NEW YORK 10023
Attorneys for Plaintiff Victor Voe

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

VICTOR VOE,

Plaintiff,

v.

JOHN DOES 1-9,

Defendants.

NOTICE OF CROSS MOTION

Case No. 20-cv-5737

PLEASE TAKE NOTICE that, upon the Declaration Daniel Szalkiewicz, Esq., sworn to the 28th day of October, 2024, the Declaration of Victor Voe, sworn to the 28th day of October, 2024, plaintiff will move this Court before the Honorable Ramon E. Reyes, Jr., U.S.D.J., in Room 2E North at the United States Court located at 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time selected by the Court, for an Order pursuant to Fed. R. Civ. P. Rule 15(a)(2) for an order granting plaintiff's motion to file a Second Amended Complaint in the form annexed hereto as Exhibit 5.

Dated: October 28, 2024

/s/ Daniel Szalkiewicz
Daniel S. Szalkiewicz